

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNIVERSAL CONNECTIVITY  
TECHNOLOGIES INC.,

Plaintiff,

v.

LENOVO GROUP LIMITED,  
Defendant.

Case No. 2:23-cv-00449-JRG

**JURY TRIAL DEMANDED**

**PLAINTIFF’S UNOPPOSED MOTION TO WITHDRAW UNIVERSAL  
CONNECTIVITY TECHNOLOGIES INC.’S MOTION TO COMPEL  
DISCOVERY FROM DEFENDANT LENOVO GROUP LIMITED (DKT. NO. 112)**

Plaintiff Universal Connectivity Technologies Inc. (“UCT”) respectfully files this Motion to Withdraw UCT’s previously filed Motion to Compel Discovery from Defendant Lenovo Group Limited (“LGL”) for the following reasons:

On April 7, 2025, Plaintiff UCT filed a Motion to Compel Discovery from Defendant LGL (Dkt. 112) seeking certain supplemental responses to UCT’s Interrogatories to Defendant LGL. On April 18, 2025, Defendant LGL supplemented its responses to each of UCT’s Interrogatories Nos. 1 and 11. Based on the supplemental responses, UCT hereby requests that the Motion to Compel Discovery (Dkt. 112) be withdrawn. Defendant LGL does not oppose this Motion to Withdraw.<sup>1</sup>

---

<sup>1</sup> Defendant LGL maintains that Plaintiff UCT’s Motion to Compel Discovery (Dkt. 112) itself was improper, including because the Motion to Compel violated the substantive and procedural conference requirements of Local Rule CV-7(h) and (i).

Dated: April 21, 2025

Respectfully submitted,

By: /s/ Brett Cooper

Brett E. Cooper (NY SBN 4011011)

[bcooper@bc-lawgroup.com](mailto:bcooper@bc-lawgroup.com)

Seth Hasenour (TX SBN 24059910)

[shasenour@bc-lawgroup.com](mailto:shasenour@bc-lawgroup.com)

Jonathan Yim (TX SBN 24066317)

[jyim@bc-lawgroup.com](mailto:jyim@bc-lawgroup.com)

Drew B. Hollander (NY SBN 5378096)

[dhollander@bc-lawgroup.com](mailto:dhollander@bc-lawgroup.com)

Ashley M. Ratycz (IL SBN 6330321)

[aratycz@bclgpc.com](mailto:aratycz@bclgpc.com)

**BC LAW GROUP, P.C.**

200 Madison Avenue, 24th Floor

New York, NY 10016

Tel.: (212) 951-0100

Fax: (646) 293-2201

*Attorneys for Plaintiff Universal Connectivity  
Technologies Inc.*

**CERTIFICATE OF SERVICE**

I certify that this document is being served upon counsel of record on April 21, 2025 via electronic service.

/s/ Brett Cooper  
Brett Cooper

**CERTIFICATE OF CONFERENCE**

Counsel for both parties have complied with the meet and confer requirements and the motion is submitted as unopposed

/s/ Brett Cooper  
Brett Cooper